



Penny, Botticello  
& O'Brien PC

ATTORNEYS AT LAW

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March 20, 2007

State of Connecticut  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**RE: Docket No. 328 - Optasite Towers LLC and Omnipoint Communications, Inc., application for a Certificate of Environmental Compatibility and Public Need / 1027 Middle Turnpike East, Manchester, Connecticut**

Dear Sir/Madam:

Please be advised that our office represents, Robert D. Harrison, the owner of property at 943 Middle Turnpike, Manchester, CT, which property abuts the subject property.

Enclosed please find an original and 20 copies of Mr. Harrison's Request for Party Status in the above-referenced matter.

Should you need any further information or have any questions, please do not hesitate to contact our office.

Very truly yours,

  
Theresa S. Galica  
Paralegal

/tsg  
Enclosures

cc: Mr. Robert D. Harrison (w/enclosure)

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**STATE OF CONNECTICUT**  
*CONNECTICUT SITING COUNCIL*

Date: March 20, 2007


Re: Docket No. 328- Optasite Towers LLC and Omnipoint Communications, Inc.  
application for a Certificate of Environmental Compatibility and Public Need for the  
construction, maintenance and operation of a telecommunications facility located at  
1027 Middle Turnpike East, Manchester, Connecticut.

REQUEST FOR PARTY STATUS

1.     Petitioner:     Robert D. Harrison  
                          c/o Stephen T. Penny, Esquire  
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2.     Petitioner claims to be substantially and specifically affected as he is the owner of property located at 943 Middle Turnpike East, Manchester, Connecticut, which abuts the subject property immediately westerly thereof, and is located within the 130-150' fall zone of the proposed personal communications services tower if constructed on the alternate site.
3.     It is the contention of the Petitioner that the proposed location and manner of construction is not in conformance with the Manchester Zoning Regulations, which while not legally dispositive in the circumstances, should be given weight by this council. The Petitioner further contends that the proposed location and manner of construction are not consistent with the Inland-Wetland Regulations of the Town. Petitioner contends as well that any manufactured breakpoint proposed for the tower will not afford meaningful protection to the Petitioner or his property. Petitioner contends that the applicant has not adequately addressed the visual impact of the tower from neighboring properties. Petitioner also reminds the council that an earlier application for the same primary and alternate sites was withdrawn when the council challenged that applicant about its failure to explore a number of alternative sites offering less impact on neighboring residential properties.
4.     The relief sought by the Petitioner is disapproval of the proposed Alternate Site.

5. The statutory or other authority for such relief is found in Chapter 277a of the Connecticut General Statutes.
6. The nature of evidence that the Petitioner intends to present includes copies of the relevant sections of the Manchester Zoning and Inland-Wetland Regulations, various documents placed in evidence by the Applicant showing the location of the Petitioner's property and wetlands with respect to the proposed Alternate Site.

PETITIONER  
Robert D. Harrison

By   
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